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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

METEJEMEI, LLC, an Nevada limited liability company,

Plaintiff,

vs.

MONEYTREE, INC., a Washington corporation; DOES I through X, inclusive; and ROE BUSINESS ENTITIES I through X, inclusive;

Defendant(s).

Case No. 2:21-cv-00249-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FOURTH REQUEST)**

Plaintiff METEJEMEI, LLC (“METEJEMEI”) and defendant Moneytree, Inc. (“Moneytree”) stipulate to extend the discovery deadline for an additional 30 days to complete the Rule 30(b)(6) depositions of the parties, pursuant to Fed. R. Civ. P. 26 as follows:

I. DISCOVERY COMPLETED

1. A Scheduling Order was issued by the Court on March 23, 2021 under ECF No. 13.

1 2. METEJEMEI made its initial disclosures on April 1, 2021 and
2 supplemented those disclosures on September 21, 2021.

3 3. Moneytree made its initial disclosures on March 22, 2021.

4 4. METEJEMEI propounded a first set of document requests to
5 Moneytree on July 21, 2021, to which Moneytree responded on August 30, 2021.

6 5. METEJEMEI propounded a first set of interrogatories to
7 Moneytree on July 28, 2021, to which Plaintiff responded on August 27, 2021.

8 6. Moneytree propounded a first set of document requests to
9 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,
10 2021.

11 7. Moneytree propounded a first set of interrogatories to
12 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,
13 2021.

14 8. METEJEMEI made its first supplemental disclosure on
15 September 21, 2021 and second supplemental disclosure on November 30, 2021.

16 9. METEJEMEI began its deposition of Moneytree's 30(b)(6)
17 representative on November 16, 2021.

18 **II. DISCOVERY REMAINING**

19 1. Deposition of the 30(b)(6) representative for METEJEMEI.

20 2. Completion of deposition of the 30(b)(6) representative for
21 Moneytree.

22 3. Moneytree's supplemental responses to METEJEMEI's
23 discovery requests in light of this Court's order granting METEJEMEI's motion to
24 compel.

III. REASONS WHY DISCOVERY CANNOT BE COMPLETED

The deposition of Moneytree's 30(b)(6) representative was originally scheduled for November 19, 2021, but the parties agreed to postpone the deposition due to the Court's order setting oral argument on November 23, 2021 on METEJEMEI's motion to compel. Since that hearing, Moneytree has been working to collect the documents for a supplemental production in response to the Court's order granting the motion in part. Once produced, METEJEMEI will complete the deposition of Moneytree's 30(b)(6) representative.

The parties have had difficulty scheduling the deposition of METEJEMEI 30(b)(6) representative since the Court's last extension because counsel for METEJEMEI has been in trial for the past two weeks in the Eighth Judicial District Court. Now that those two trials are complete, the parties anticipate completing the deposition in short order.

IV. CURRENT DEADLINES AND PROPOSED NEW DEADLINES

Event	Current Deadline	Proposed Deadline
Close of Discovery Deadline	December 13, 2021	January 28, 2022
Dispositive Motion Deadline	December 22, 2021	February 28, 2022
Pretrial Disclosures / Order	January 21, 2022	March 30, 2022

V. OTHER

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

The parties agree that this discovery extension will be for the issues identified in Section III above only and no new discovery requests will be served absent compelling circumstances. To the extent additional discovery is needed, the parties will meet and confer.

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BALLARD SPAHR



/s/ Joel E. Tasca

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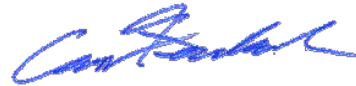
Attorney for Defendant
Moneytree, Inc.

Attorneys for Plaintiff
METEJEMEI, LLC

ORDER

IT IS SO ORDERED.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge
12-10-2021

DATED _____